

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

United States District Court
MGM-SDTX
FILED

JAN 03 2024 AT

Nathan Ochsner, Clerk
Laredo Division

UNITED STATES OF AMERICA

v.

HOMERO TOVAR

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CRIMINAL NO. 5:23-cr-575

FACTUAL STATEMENT IN SUPPORT OF PLEA AGREEMENT

The United States of America, by and through Alamdar S. Hamdani, United States Attorney for the Southern District of Texas and Steven Chamberlin, Assistant United States Attorney, and the defendant, **HOMERO TOVAR** and the defendant's counsel, hereby stipulate as follows:

I.

If this case proceeded to trial, the United States of America would prove each element of the offense beyond a reasonable doubt. The following facts, among others, would be offered to establish the Defendant's guilt:

II.

On April 18, 2023, police were called to the 2500 block of La Parra Lane, Laredo, Texas, regarding a fight in progress. LPD arrived and members of the crowd identified the Defendant as possessing a firearm. Witnesses stated the firearm was inside a black Dodge Charger. LPD contacted the Defendant's wife, who claimed ownership of the black Dodge Charger. The Defendant's wife consented to a search of the black Dodge charger. Police found a Glock Model 22, Serial Number CMK798, .40 caliber pistol, under a backpack on the left rear floorboard.

ATF Agents determined the Glock Model 22 was manufactured outside the State of Texas. Law Enforcement ran the Defendant's criminal history and determined the Defendant has a prior felony conviction in Webb County, Texas, where he served 2 years in prison for robbery.

The defendant was interviewed by Law Enforcement and after being advised of his *Miranda* rights and waiving them, the defendant admitted owning the Glock Model 22, Serial Number CMK798, .40 caliber pistol.

III.

Defendant, **HOMERO TOVAR**, hereby confesses and judicially admits that on **April 18, 2023, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a Firearm/ Ammunition, and that the Firearm/ Ammunition was in and affecting commerce**, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2).

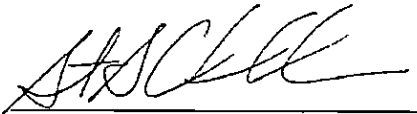


HOMERO TOVAR
Defendant

APPROVED:

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY

By:



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Roberto Balli
Attorney for Defendant